

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
Robertson, Anschutz & Schneid, P.L. 6409 Congress Ave., Suite 100 Boca Raton, FL 33487 Telephone Number 561-241-6901 Attorneys For Secured Creditor Kevin Buttery, Esq. (KB-9438)	CASE NO.: 17-31785-MBK CHAPTER 13 Objection to Confirmation of Debtor's Chapter 13 Plan
In Re: Robert Elliott Shanley, III Debtor.	

OBJECTION TO CONFIRMATION OF DEBTOR'S CHAPTER 13 PLAN

U.S. BANK NATIONAL ASSOCIATION ("Secured Creditor"), by and through its undersigned counsel, objects to confirmation of Debtor's Chapter 13 Plan (DE # 9), and states as follows:

1. Debtor, Robert Elliott Shanley, III, ("Debtor"), filed a voluntary petition pursuant to Chapter 13 of the Bankruptcy Code on October 27, 2017.
2. Secured Creditor holds security interest in the Debtor's 2011 Volvo SC 90. (the "Collateral").
3. The Debtor filed a Chapter 13 Plan on November 13, 2017.
4. The Plan fails to include treatment of Secured Creditor's claim. The subject property and claim are, however, listed in Debtor's schedules. Secured Creditor objects to the Plan and seeks clarification as to Debtor's intentions in regard to the subject property and claim.

WHEREFORE, Secured Creditor respectfully requests this Court sustain the objections stated herein and deny confirmation of Debtor's Plan, and for such other and further relief as the Court may deem just and proper.

Robertson, Anschutz & Schneid, P.L.
Attorney for Secured Creditor
6409 Congress Ave., Suite 100
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Telephone Number 561-241-6901

By: /s/Kevin Buttery
Kevin Buttery, Esquire
NJ Bar Number KB-9438
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CERTIFICATION OF SERVICE

1. I, Kevin Buttery, represent U.S. BANK NATIONAL ASSOCIATION in this matter.
2. On 12/26/2017, I caused a copy of the following pleadings and/or documents to be sent to the parties listed in the chart below.
3. I certify under penalty of perjury that the above documents were sent using the mode of service indicated.

12/26/2017

Robertson, Anschutz & Schneid, P.L.
Attorney for Secured Creditor
6409 Congress Ave., Suite 100
Boca Raton, FL 33487
Telephone Number <<Special.FirmPhone>

By: /s/Kevin Buttery
Kevin Buttery, Esquire
NJ Bar Number KB-9438
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<u>Name and Address of Party Served</u>	<u>Relationship of Party to the Case</u>	<u>Mode of Service</u>
Joseph Casello Collins, Vella & Casello 2317 Route 34 South Suite 1A Manasquan, NJ 08736	Attorney for Debtor	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other
Robert Elliott Shanley, III PO Box 641 Navesink, NJ 07752	Debtor	<div>(as authorized by the court*)</div> <input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other
Albert Russo Standing Chapter 13 Trustee CN 4853 Trenton, NJ 08650-4853	Trustee	<div>(as authorized by the court*)</div> <input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other
U.S. Trustee US Dept of Justice Office of the US Trustee One Newark Center Ste 2100 Newark, NJ 07102	U.S. Trustee	<div>(as authorized by the court*)</div> <input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other
		(as authorized by the court*)